

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
) No. 20 CR 704
v.)
) Judge John Z. Lee
ADAM BLOCKER)

PROTECTIVE ORDER REGARDING SENSITIVE SUBPOENA MATERIALS

With the agreement of Adam Blocker, the United States of America, and the National Center for Missing and Exploited Children (“NCMEC”), the Court enters the following protective order.

1. Pursuant to Mr. Blocker’s subpoena, NCMEC will produce documents and other materials pertaining to the defendant and the charged offense to defense counsel. The discovery to be provided includes documents or other material that includes NCMEC’s proprietary information, other third-party proprietary information, and other private party information, including confidential, research, development, or commercial information, other non-public financial data, and private individual data (“NCMEC Sensitive Information”).
2. Prior to producing materials to defense counsel, NCMEC may, in good faith, designate materials, such as documents and tangible things (including e-mail and electronic data), in this matter that contain NCMEC Sensitive Information as “PROTECTED” and subject to this Protective Order.
3. To ensure that the NCMEC Sensitive Information is not subject to unauthorized disclosure or misuse, IT IS HEREBY ORDERED that defense counsel of record, their investigators, assistants, and employees (collectively, “the defense team”) may review with the defendant all discovery material produced by NCMEC, but shall not provide defendant with

copies of, or permit defendant to make copies of, or have unsupervised access to, any NCMEC Sensitive Information, unless the sensitive material has first been entirely redacted from the discovery materials. NCMEC and defense counsel are ordered to work together to ensure that these materials are protected, but that defendant has as much access to the materials as can be provided consistent with this Court's order. Defense counsel may also provide copies of the NCMEC Sensitive Information to any experts retained to assist with the preparation of the defense in the captioned case.

4. Defense counsel may provide any and all discovery, regardless of whether it contains NCMEC Sensitive Information, to the government. Documents and tangible things designated as "PROTECTED" under this Protective Order shall be used only for the purpose of this matter and shall not be used for any personal or business purpose, or in any other litigation or other proceeding, or for any other purpose, except by leave of Court. Anyone who receives discovery under this Order shall be provided a copy of this Order and shall initial and date the order reflecting their agreement to be bound by it before reviewing or possessing any documents subject to this Protective Order. This Order shall also apply to any copies made of any materials covered by this Order.

5. IT IS FURTHER ORDERED that neither defendant nor any member of the defense team shall provide any NCMEC Sensitive Information to any third party (i.e., any person who is not a member of the defense team) other than the government or make any public disclosure of the same, other than in a court filing, without further order of this Court. If a party files a pleading that references or contains or attaches NCMEC Sensitive Information subject to this Order, that filing must be under seal.

6. This stipulation is without prejudice to either party applying to the Court to

modify the terms of any protective order. This Court shall retain jurisdiction to modify this Order upon motion of either party even after the conclusion of district court proceedings in this case.

7. This Protective Order shall remain in full force and effect during and after the termination of this matter, whether by settlement, judgment, or other disposition or conclusion and all appeals therefrom, until modified by an Order of the Court.

ENTERED: 7/16/21



JOHN Z. LEE
District Court Judge
United States District Court
Northern District of Illinois